

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|--------------------------|---|----------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| vs. |) | Case No. 4:16-CR-00148-HEA |
| |) | |
| THOMAS CARROLL, |) | |
| |) | |
| Defendant. |) | |
| |) | |

MOTION FOR CONTINUANCE

Comes now Neil J. Bruntrager of Bruntrager & Billings, P.C., attorney for Defendant Thomas Carroll and respectfully requests a continuance on the above styled matter from the July 14, 2016 sentencing date. In support thereof, counsel states as follows:

1. Additional investigation and preparation is necessary;
2. This request is by consent of both parties;
3. This request is not for the purpose of undue delay but in the interest of justice.

Wherefore, Respondent requests this matter be continued from the docket of July 14, 2016 and placed on the docket the week of July 25, 2016

BRUNTRAGER & BILLINGS, P.C.

/s/ Neil J. Bruntrager
Neil J. Bruntrager #29688
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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of July, 2016, the foregoing **Motion for Continuance** filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Neil J. Bruntrager